

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

BUZZFEED, INC.,

Plaintiff,

-against-

U.S. DEPARTMENT OF JUSTICE,

Defendant.

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Case No. 17-cv-07949

DECLARATION OF ZOE TILLMAN

Pursuant to 28 U.S. Code § 1746, I, Zoe Tillman, declare the following to be true under penalties of perjury:

1. My name is Zoe Tillman and I am a reporter for BuzzFeed, Inc. I submit this declaration in support of BuzzFeed, Inc.’s Cross-Motion for Summary Judgment seeking release of an unredacted Report of Investigation that Defendant Department of Justice has improperly withheld.

2. A true and correct copy of my May 16, 2017 Freedom of Information Act (“FOIA”) request (Request No. 17-OIG-208) is annexed hereto as Exhibit 1.

3. A true and correct copy of investigative summary titled “Finding of Misconduct by a Former United States Attorney for Having an Inappropriate Relationship With a Subordinate” posted to the Office of the Inspector General for the Department of Justice’s website is annexed hereto as Exhibit 2.


4. A true and correct copy of the June 12, 2017 response by the Office of the Inspector General for the Department of Justice to my FOIA request, including a redacted version of the report of investigation, is annexed hereto as Exhibit 3.

5. A true and correct copy of my June 28, 2017 appeal (Appeal No. DOJ-AP-2017-005443), complete with exhibits, is annexed hereto as Exhibit 4.

6. A true and correct copy of September 15, 2017 disposition on appeal, complete with exhibits, which I received on September 18, 2017, is annexed hereto as Exhibit 5.

7. A true and correct copy of the BuzzFeed News article *Investigators Find Justice Department Officials Mishandled Allegations Of Groping And Stalking*, which includes a statement by Deputy Attorney General Rod Rosenstein, is annexed hereto as Exhibit 6.

I declare under penalty of perjury that the foregoing is true and correct. Executed on:
April 20, 2018 in Washington, D.C.



Zoe Tillman